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Attorneys for Plaintiff,  
ALEX VILLANUEVA

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

ALEX VILLANUEVA,

Plaintiff,

vs.

COUNTY OF LOS ANGELES,  
COUNTY OF LOS ANGELES  
SHERIFF'S DEPARTMENT, LOS  
ANGELES COUNTY BOARD OF  
SUPERVISORS, COUNTY EQUITY  
OVERSIGHT PANEL, LOS  
ANGELES COUNTY OFFICE OF  
INSPECTOR GENERAL,  
CONSTANCE KOMOROSKI,  
MERCEDES CRUZ, ROBERTA  
YANG, LAURA LECRIVAIN,  
SERGIO V. ESCOBEDO, RON  
KOPPERUD, ROBERT G. LUNA,  
MAX-GUSTAF HUNTSMAN,  
ESTHER LIM, and DOES 1 to 100,  
inclusive,

Defendants.

Case No.: 2:24-cv-04979-SVW-JC

[Assigned to **Hon. Stephen v. Wilson** and  
**Magistrate Judge Jacqueline Chooljian**]

**PLAINTIFF ALEX VILLANUEVA'S  
NOTICE OF MOTION AND MOTION *IN*  
*LIMINE* NO. 3 TO EXCLUDE NICK  
WILSON'S POLITICAL OPINIONS**

**(MIL NO. 3 OF 6)**

[Filed concurrent with Declaration of Alex  
DiBona ("DiBona Decl."), Exhibits and  
Proposed Order thereon]

Date: May 26, 2025

Time: 1:30 p.m.

Dept.: 10A

Trial Date: June 3, 2025

Action Filed: June 13, 2024

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on May 26, 2025, 1:30 p.m. or as soon thereafter as  
3 the matter may be heard before the Honorable Stephen V. Wilson in Courtroom 10A of  
4 the United States District Court for the Central District of California, located at 350 West  
5 1<sup>st</sup> Street, Los Angeles, California 90012,, will move *in limine* to exclude all references  
6 to Nick Wilson's personal political views, including any Instagram activity, comments  
7 about January 6, support or criticism of Matt Gaetz, the GOAT initiative, Patriot  
8 movement, or any mention of the Southern Poverty Law Center. This evidence is  
9 irrelevant and inflammatory, would and invite jury bias. Their only effect would be to  
10 taint the jury's perception of Wilson based on his perceived ideology.

11 This motion is brought on the following grounds, it is irrelevant (FRE 402) and  
12 even if Relevant, is certainly more prejudicial than probative (FRE 403).

13 This motion will be based on the following Memorandum of Points and  
14 Authorities, Declaration of Alex DiBona, and exhibit filed along with these papers, and  
15 other evidence to be presented at the hearing on this motion.

16 Pursuant to L.R. 7-3, on April 21, 2025, Plaintiff's counsel met and conferred with  
17 Defendant's counsel regarding this matter. Defendant's counsel informed Plaintiff's  
18 counsel that Defendant would not stipulate the exclusion of such evidence. *See* DiBona  
19 Decl., ¶ 2.

20  
21 Dated: April 28, 2025

SHEGERIAN & ASSOCIATES, INC.

22  
23 By: 

Alex DiBona, Esq

24 Attorneys for Plaintiff,  
25 ALEX VILLANUEVA  
26  
27  
28

## MEMORANDUM OF POINTS AND AUTHORITIES

### 1. INTRODUCTION

Plaintiff, Alex Villanueva (“Plaintiff”), seeks by way of this Motion *in Limine* No. 4 (“MIL No. 4”) to preclude defendants – County of Los Angeles, County of Los Angeles Sheriff’s Department, Los Angeles County Board of Supervisors, Los Angeles County Office of Inspector General, Constance Komoroski, Mercedes Cruz, Roberta Yang, Laura Lecrivain, Sergio V. Escobedo, Ron Kopperud, Robert G. Luna, Max-Gustaf Huntsman, and Esther Lim (collectively, “Defendants”) – from making any reference to Nick Wilson’s (“Wilson”) personal political views, including any Instagram activity, comments about January 6, support or criticism of Matt Gaetz, the GOAT initiative, Patriot movement, or any mention of the Southern Poverty Law Center.

First, this evidence is not relevant and should be excluded on that basis alone. “Irrelevant evidence is not admissible.” Fed. R. Evid. 402.

Second, “The court may exclude relevant evidence if its probative value is substantially outweighed by a danger of one or more of the following: unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence.” Fed. R. Evid. 403.

Third, this evidence cannot come in for impeachment either as it is collateral to the issues in this case. “While collateral matters are admissible for impeachment purposes, the collateral character of the evidence reduces its probative value.” *People v. Lavergne*, 4 Cal.3d 735, 742 (1971). “Unlimited inquiry into collateral matters is not permitted.” *People v. Jennings* (1991), 53 Cal. 3d 334, 372. “Although the right of confrontation includes the right to cross-examine adverse witnesses on matters reflecting on their credibility, ‘trial judges retain wide latitude insofar as the Confrontation Clause is concerned to impose reasonable limits on such cross-examination.’” *People v. Quartermain* (1997), 16 Cal. 4<sup>th</sup> 600, 623. Excluding “impeaching evidence on collateral matters which has only slight probative value on the issue of veracity does not

1 infringe on the defendant’s right of confrontation.” *People v. Greenberger* (1997), 58  
2 Cal.App.4<sup>th</sup> 298, 350.

3 Third, this evidence should be excluded pursuant to Federal Rules of Evidence  
4 Section 403. Evidence of Wilson’s personal opinions regarding the above is relevant to  
5 neither the case as a whole nor the scope of his anticipated testimony. Even if the  
6 evidence were to be deemed relevant, it would certainly be outweighed by its prejudicial  
7 effect and cause unfair prejudice and confusion for the jury. Furthermore, these opinions  
8 have no bearing on Wilson’s truthfulness or credibility, and Defendants have not shown  
9 how exclusion of evidence of these very-collateral matters will prejudice them.

10 For the aforementioned reasons, as well as the reasons further discussed below,  
11 plaintiff respectfully requests that the Court grant Plaintiff’s motion *in limine*.  
12

## 13 2. ARGUMENT

### 14 A. Evidence of Wilson’s Personal Beliefs is Irrelevant

15 At deposition, Defense counsel repeatedly solicited Nick Wilson’s political  
16 opinions. This included his run for state senate (DiBona **Decl. Exhibit 6**). This  
17 association with political groups the southern poverty law center disapproves of (*Id.*  
18 **Exhibit 7**). This also included who he follows on Instagram. (*Id.* **Exhibit 8**). None of  
19 these topics should be admitted at trial.

20 “Irrelevant evidence is not admissible.” Fed. R. Evid. 402. “The court may exclude  
21 relevant evidence if its probative value is substantially outweighed by a danger of one or  
22 more of the following: unfair prejudice, confusing the issues, misleading the jury, undue  
23 delay, wasting time, or needlessly presenting cumulative evidence.” Fed. R. Evid. 403.

24 Wilson’s personal political views – including any Instagram activity, comments  
25 about January 6, support or criticism of Matt Gaetz, the GOAT initiative, Patriot  
26 movement, or any mention of the Southern Poverty Law Center – are irrelevant with  
27 regards the anticipated scope of his testimony, nor do they go to show his tendency for  
28 untruthfulness. Wilson is being called as a witness for Plaintiff’s emotional distress. His

1 personal political opinions do not have any tendency to prove or disprove any aspect of  
2 his testimony. Plaintiff anticipates that Defendants will merely exploit this evidence by  
3 means of a thinly-veiled attempt to prejudice the jury. Furthermore, Plaintiff fears that  
4 introduction of such evidence will merely cause confusion and create a trial within a trial  
5 as Defendants and Wilson engage in a back and forth to establish which opinions Wilson  
6 held and to which degree he held them.

7 **B. Wilson’s Personal Political Opinions are a Collateral Matter.**

8 “While collateral matters are admissible for impeachment purposes, the collateral  
9 character of the evidence reduces its probative value.” *People v. Lavergne*, 4 Cal.3d  
10 735, 742 (1971). “Unlimited inquiry into collateral matters is not permitted.” *People v.*  
11 *Jennings* (1991), 53 Cal. 3d 334, 372. “Although the right of confrontation includes the  
12 right to cross-examine adverse witnesses on matters reflecting on their credibility, ‘trial  
13 judges retain wide latitude insofar as the Confrontation Clause is concerned to impose  
14 reasonable limits on such cross-examination.’” *People v. Quartermain* (1997), 16 Cal. 4<sup>th</sup>  
15 600, 623. Excluding “impeaching evidence on collateral matters which has only slight  
16 probative value on the issue of veracity does not infringe on the defendant’s right of  
17 confrontation.” *People v. Greenberger* (1997), 58 Cal.App.4<sup>th</sup> 298, 350.

18 Here, evidence regarding Wilson’s personal political opinions are clearly a  
19 collateral issue, as they have nothing to do with the anticipated scope of his testimony as  
20 a witness to Plaintiff’s emotional distress, nor do they go towards his tendency for  
21 untruthfulness or bias. Thus – in the absence of any evidence from Defendants to the  
22 contrary – the probative value of such evidence is slight enough that its exclusion will  
23 not prejudice Defendants.

24 **C. Wilson’s Political Opinions are More Prejudicial Than Probative**

25 Even if Defendant could establish relevance, which they cannot, the evidence  
26 should still be excluded under FRE 403 because it is prejudicial. Defense counsel  
27 improperly sought opinions on “hot button” issues such as illegal immigration,  
28 January 6 and sought to paint Wilson’s associations as distasteful. This will clearly

1 result in undue consumption of time and has a tendency to inflame the passions  
2 and prejudices of the jury.

3 **3. CONCLUSION**

4 Plaintiff, Alex Villanueva, respectfully requests that this Court grant plaintiff's  
5 motion *in limine*.

6  
7 Dated: April 28, 2025

SHEGERIAN & ASSOCIATES, INC.

8  
9 By:



Alex DiBona, Esq.

10  
11 Attorneys for Plaintiff,  
ALEX VILLANUEVA

VILLANUEVA V. COUNTY OF LOS ANGELES, et al. USDC Case No. 2:24-cv-04979-SVW-JC

**PROOF OF SERVICE**  
**UNITED STATES DISTRICT COURT,**  
**CENTRAL DISTRICT OF CALIFORNIA**

I am an employee in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 11520 San Vicente Boulevard Los Angeles, California 90049.


On April 28, 2025, I served the foregoing document, described as “**PLAINTIFF ALEX VILLANUEVA’S NOTICE OF MOTION AND MOTION *IN LIMINE* NO. 3 TO EXCLUDE NICK WILSON’S POLITICAL OPINIONS**” on all interested parties in this action as follows:

**Louis R. Miller, Esq.**  
**Jason H. Tokoro, Esq.**  
**Steven G. Williamson, Esq.**  
**Miller Barondess, LLP**  
**2121 Avenue of the Stars, Suite 2600**  
**Los Angeles, CA 90067**  
**smiller@millerbarondess.com**  
**jtokoro@millerbarondess.com**  
**swilliamson@millerbarondess.com**

☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

☒ **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on April 28, 2025, at Los Angeles, California

  
\_\_\_\_\_  
Amelia Sanchez